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7	UNITED STATES DISTRICT COURT FOR THE		
8	WESTERN DISTRICT OF WASHINGTON AT SEATTLE		
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10	UNITED STATES OF AMERICA,	NO. C16-0373	
11	Plaintiff		
12	V.	COMPLAINT FOR FORFEITURE IN REM	
13	FIVE (5) VERIZON WIRELESS CARDS VALUED AT \$500.00 IN U.S. CURRENCY,		
14	and NINETEEN (19) AMEX BUSINESS		
15	GIFT CARDS VALUED AT \$39,052.06 IN U.S. CURRENCY,		
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17	Defendants.		
18	COMES NOW, the United States of Amer	rica, by and through Annette L. Hayes,	
19	United States Attorney for the Western District of Washington, and Matthew H. Thomas		
20	Assistant United States Attorney for said District	, and alleges:	
21	1. This is a Complaint for seizure and	forfeiture of Five (5) Verizon Wireless	
22	Cards Valued at \$500.00 in U.S. Currency, and N	Vineteen (19) Amex Business Gift Cards	
23	Valued at \$39,052.06 in U.S. Currency, seized from	om Maziar Rezakhani's storage unit	
24	located at 688 110 th Avenue, NE, Unit #S-3301, Bellevue, Washington, (hereinafter, "the		
25	defendant property"), brought pursuant to Title 18, United States Code, Section		
26	981(a)(1)(C), as proceeds of violation of Title 18, United States Code, Section 1344		
27	(Bank Fraud).		
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1	2.	This Court has jurisdiction over this action pursuant to Title 28,
2	United State	es Code, Sections 1345 and 1355.
3	3.	This Court has venue pursuant to Title 28, United States Code,
4	Section 139	95.
5	4.	The defendant property as described above is now in the jurisdiction of this
6	Court.	
7	5.	Additional facts supporting the forfeiture of the defendant property are set
8	forth in the	attached Affidavit of Internal Revenue Service (IRS) Special Agent Roberto
9	A. Ustaris,	which is attached as Exhibit A and incorporated as if fully set forth in this
10	Complaint.	
11	6.	By reason of the foregoing, the United States alleges that the defendant
12	property is	subject to forfeiture pursuant to Title 18, United States Code,
13	Section 981	(a)(1)(C), as proceeds of violations of Title 18, United States Code,
14	Section 134	4 (Bank Fraud).
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1	WHEREFORE, the United States requests that due process issue to enforce the		
2	forfeiture of the defendant property, that due notice be given to all interested persons to		
3	appear and show cause why forfeiture of the defendant property should not be decreed,		
4	that the defendant property be condemned as forfeited to the United States to be disposed		
5	of according to law, and for such other and further relief as the Court may deem just and		
6	proper.		
7	DATED this 11 th day of March, 2016.		
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9	Respectfully submitted,		
10	ANNETTE L. HAYES		
11	United States Attorney		
12	s/Matthew H. Thomas		
13	MATTHEW H. THOMAS Assistant United States Attorney		
14	1201 Pacific Avenue, Suite 700		
15	Tacoma, WA 98402 Telephone: (253) 428-3800		
16	Fax: (253) 428-3836		
17	Email: Matthew.Thomas@usdoj.gov		
18	Attorney for Plaintiff United States		
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VERIFICATION OF COMPLAINT 1 STATE OF WASHINGTON SS 3 COUNTY OF SNOHOMISH 4 I. Roberto A. Ustaris, declare under penalty of perjury that the following is true 5 and correct to the best of my knowledge: 6 I am a Special Agent with the United States Department of treasury, Internal 7 Revenue Service, Criminal Investigation, and am assigned to this case. I have read the 8 attached Complaint and know the contents thereof; I have furnished the information 9 contained in the Complaint based upon my own investigation and that of other reliable 10 official Government sources; and, based on this information; I believe that the allegations 11 contained in the Complaint are true. 12 13 14 ROBERTO A. USTARIS, Special Agent Internal Revenue Service 15 Criminal Investigation 16 SUBSCRIBED and SWORN to before me this 11th day of March, 2016, by IRS 17 Special Agent Robert A. Ustaris. 18 19 20 Notary Public State of Washington, residing at Evere W. V.A. 21 State of Washington DANIEL F LOWELL 22 My Appointment Expires Dec 1, 2019 23 24 25 26

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